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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA EASTERN DIVISION

JEFF MACY, as an individual,
Plaintiff,

vs.

CALIFORNIA HIGHWAY PATROL, a
State Agency; Officer CHRISTOPHER
BATES, in his official & individual
capacity, Supervisor Officer Sergeant
JEFFREY O'BRIEN, in his official &
individual capacity, & DOES 1-10,
inclusive,

Defendants.

Case No.: **5:23-CV-02245-RGK-BFM**

**INTERROGATORIES TO
DEFENDANTS OFFICER
CHRISTOPHER BATES &
SUPERVISOR OFFICER SERGEANT
JEFFREY O'BRIEN**

Judge: Hon. Brianna Fuller Mircheff
Trial Date: TBA
Action Filed: 5/06/2024

SET NO. 1

Pursuant to Federal Rules of Civil Procedure 26 & 33 & Local Rule 33,
Defendant CSA-18 Special Districts Public Works, shall respond to these
interrogatories within thirty (30) days of service.

INTERROGATORIES

The Plaintiff requests that the Defendant answer under oath, in
accordance with Rule 33 of the Federal Rules of Civil Procedure, the
following interrogatories.

INSTRUCTIONS & DEFINITIONS

- A. Each Interrogatory should be answered upon your entire knowledge
from all sources & all information in your possession or otherwise
available to you, including information from your officers, employees,
agents, representatives or consultants & information which is known

1 by each of them. An incomplete or evasive answer is a failure to
2 answer.

3 B. If any answer is qualified, state specifically the terms of each
4 qualification & the reasons for it. If an Interrogatory cannot be
5 answered in full, state the part which can be answered & answer the
6 same in full to the extent possible; state further & specifically the
7 reason(s) why the remainder cannot be answered.

8 C. Each Interrogatory is considered continuing, & if Defendant obtains
9 information which renders its answers or one of them, incomplete or
10 inaccurate, Defendant is obligated to serve amended answers on the
11 undersigned.

12 D. "Document(s)" shall mean & include any printed, typewritten,
13 handwritten or otherwise recorded matter of whatever character,
14 including specifically, but not exclusively, & without limiting the
15 generality of the foregoing, letters, diaries, desk & other calendars,
16 memoranda, telegrams, posters, cables, reports, charts, statistics,
17 envelopes, studies, newspapers, news reports, business records, book
18 of account(s) or other books, ledgers, balance sheets, journals,
19 personal records, personal notes, any piece of paper, parchment, or
20 other materials similarly used with anything written, typed, printed,
21 stamped, engraved, embossed, or impressed upon it, accountants
22 statements, accounting records of any kind, bank statements,
23 minutes of meetings or other minutes, labels, graphics, notes of
24 meetings or conversations or other notes, catalogues, written
25 agreements, checks, announcements, statements, receipts, returns
26 invoices, bills, warranties, advertisements, guarantees, summaries,
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1 pamphlets, prospectuses, bulletins, magazines, publications,
2 photographs, work-sheets, computer printouts, telex transmissions or
3 receipts, teletypes, telefaxes, file folders or other folders, tape
4 recordings, & any original or non-identical (whether different from the
5 original by reason of any notation made on such copies or otherwise),
6 carbon, photostatic or photograph copies of such materials. The term
7 "documents" shall also mean & include every other recording of, or
8 means of recording on any tangible form, any form of information,
9 data, communication, or representation, including but not limited to,
10 microfilm, microfiche, any records stored on any form of computer
11 software, audio or video tapes or discs, digitally recorded disks or
12 diskettes, or any other medium whatsoever. For each "document"
13 responsive to any request withheld from production by you on the
14 ground of any privilege, please state: (a) the nature of the document
15 (e.g., letter, memorandum, contract, etc.); (b) the author or sender of
16 the document; (c) the recipient of the document; (d) the date the
17 document was authored, sent, and/or received; & (e) the reason such
18 document is allegedly privileged. "Data" means the physical symbols
19 in the broadest sense, that represent information, regardless of
20 whether the information is oral, written or otherwise recorded.
21 "Hardware" means the physical components of a computer or any
22 device capable of maintaining recorded data. "Software" means the
23 entire set of computer programs, procedures, documentation, or
24 other recorded instructions which guide a mechanical device or
25 human in the operation of the computer or mechanical device.
26 "Computer" means any & all programmable electronic devices or
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1 apparatuses, including hardware, software, & other databanks, that
2 can store, retrieve, access, update, combine, rearrange, print, read,
3 process or otherwise alter data whether such data maintained in that
4 device or at some other location. The term “computer” includes any &
5 all magnetic recordings or systems, systems operating on or
6 maintaining data in digital, analog, or hybrid format, or other
7 mechanical devices, or other devices capable of maintaining writings
8 or recordings, of any kind, in condensed format, & includes any disk,
9 tape, recording, or other informational source, regardless of its
10 physical dimension or size. “Identify” means that you should state: (a)
11 any & all names, legal, trade or assumed; (b) all addresses used; (c)
12 all telephone & tele-fax numbers used; and, if applicable: (d) brand,
13 make, manufacturer’s name, address, phone number & the
14 manufacturer’s relationship to any & all defendants in the above
15 captioned action; & (e) employer’s name, address, phone number &
16 the employer’s relationship to any & all defendants in the above
17 captioned action. “Person(s)” means any human being, sole
18 proprietorship, limited partnership, partnership, association, group of
19 human beings, other legal or de facto entity, or corporation, of
20 whatever kind. “Explain” means to elucidate, make plain or
21 understandable, to give the reason for or cause of, & to show the
22 logical development or relationships thereof. “Describe” means to
23 represent or give an account of in words. “User” means any person or
24 computer which interacts with a different computer.
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1 E. If any Interrogatory may be answered fully by a document, the
2 document may be attached in lieu of an answer if the document is
3 marked to refer to the Interrogatory to which it responds.

4 F. "*DEFENDANTS*", "*YOU*" & "*YOUR*" shall mean Defendants Officer
5 Christopher Bates & Supervisor Officer Sergeant Jeffrey O'Brien.

6 G. "PLAINTIFF" shall mean Plaintiff Jeff Macy.

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8 **INTERROGATORIES**

- 9 1. Provide a list of each Defendants training on Plaintiff's right to record
10 an Officer on duty.
- 11 2. List all exhibits Defendants propose to introduce at trial.
- 12 3. Identify each person whom the Defendants expect to call as an expert
13 witness at trial, state the subject matter on which the expert is
14 expected to testify & the substance of the facts & opinions to which
15 the expert is expected to testify, & a summary of the grounds for
16 each opinion.
- 17 4. Provide a list of each Defendants training on seatbelts.
- 18 5. Provide a list of each Defendants training on identifying themselves.
- 19 6. Provide a list of each Defendants training on displaying nametags.
- 20 7. Provide a list of each Defendants training on entering vehicles without
21 permission.
- 22 8. Provide a list of each Defendants training on trash companies & 3-
23 point seatbelts.
- 24 9. Provide a list of each Defendants training on passengers not wearing
25 a seatbelt.
- 26 10. Provide a list of each Defendants training on how long they can detain
27 someone.
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1 14. State the name(s), business address(es) & job title(s) or capacity(ies) of
2 the officer(s), employee(s) or agent(s) answering or providing any
3 information used to answer each interrogatory.
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5 15. Identify & describe each document & record known to Defendants
6 which are related to Plaintiff.
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11 Respectfully Submitted,

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13 By Plaintiff: _____

Jeff Macy

14 Jeff Macy- 1611 Bible Law Translator.
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16 Dated: 8/12/2024
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